



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service
Agency for Toxic Substances
and Disease Registry

Memorandum

Date **October 29, 1985**

From **Acting Director
Office of Health Assessment**

Subject **Site Safety Plan for Millington, Great Swamp, White Bridge
Road and Pine Valley Tree Service Sites, N.J.**

To **Mr. Bill Nelson
Public Health Advisor
EPA Region II**

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Agency for Toxic Substances and Disease Registry has been asked to review and comment on the Health and Safety Project Plan, Remedial Investigation, for the sites referenced above. The contaminants of concern are asbestos and phenylmercuric acetate. Dumping of asbestos waste occurred at all sites, and discharge of phenylmercuric acetate occurred at the Millington Site. These sites are located adjacent to the Passaic River or its tributaries. Great Swamp site is located in the Great Swamp National Wildlife Refuge.

The objectives of the remedial activities are to conduct sampling to identify the extent and magnitude of contaminated air, soil, sediment, surface water and groundwater and to determine the stability of the asbestos piles. We are unable to assess the protection that would be provided by this plan to the surrounding community because of the lack of any demographic information in the material reviewed.

In section 6.6.2, Site-Specific Safety Plan, modified Level D protection is proposed for workers during all on-site activities including drilling and corrective actions. Air-purifying respirators with MSA GMA-F cartridges will be required during on-site soil sampling disturbance activities until airborne asbestos levels are determined. Rather than giving the manufacturer's code of GMA-F, it would be helpful to provide the generic cartridge description (i.e. organic-vapor with high efficiency particulate filter, half-face mask). In this same section the document states that "air-purifying respirators will be used only if the results (air sampling) indicate asbestos concentrations at one-half of the OSHA standard for asbestos which is 2 fibers/cubic centimeter". Due to the known carcinogenic properties of asbestos, it would be prudent to wear respiratory protection during all activities in which soil disturbance is anticipated.

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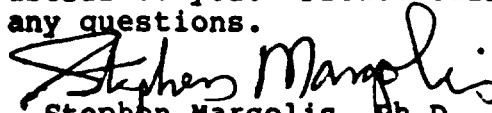
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Page 2 - Mr. Bill Nelson

Section 7.1 discusses the airborne release of asbestos fibers. It is our opinion that during the drilling operations and test pit excavation, the area should be wet down with water prior to these activities, not only if visible or measurable asbestos fibers are observed.

Thank you for the opportunity to review this document.

We hope these comments are useful to you. Please call me (FTS 236-4551) if you have any questions.


Stephen Margolis, Ph.D.

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7